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UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA

JULIA HUBBARD, et al.,

Plaintiffs,

vs.

TRAMMELL S. CROW, JR., et al.,

Defendants.

Case No. 2:22-cv-7957-FLA-
 MAA

**EX PARTE
 APPLICATION FOR LEAVE
 TO EXTEND DEADLINE TO
 RESPOND TO DEFENDANT
 CROW'S MOTION TO
 DISMISS**

[[Proposed] Order submitted
 concurrently herewith]

1 This Ex Parte Application for Leave to Extend Deadline to respond to
2 Defendant Crow's Motion To Dismiss (Dkt. No. 26) filed on January 9, 2023,
3 is made by Plaintiffs Julia Hubbard and Kayla Goedinghaus (collectively,
4 "Plaintiffs") and seeks leave for them to modify the briefing schedule in
5 connection with Plaintiffs' Reply to the Motion to Dismiss. A proposed
6 order is submitted concurrently herewith.

7 **RECITALS**

8 WHEREAS, I Matthew W. Schmidt, am an attorney with the law firm
9 Balestriere Fariello, I represent Plaintiffs and write to provide further
10 clarification relevant to the Court's January 9, 2023, Order (Dkt. No. 28)
11 granting in part and denying in party the Parties' joint application
12 concerning page limits and schedule.

13 WHEREAS, on January 24, 2023, I am scheduled to begin a jury trial
14 in the United States District Court for the Southern District of New York as
15 lead trial counsel before the Hon. Jennifer L. Rochon, currently expected to
16 last at least one week.

17 WHEREAS, as I will be the primary drafter of such opposition and I
18 expect our clients to have significant input in the contents of the opposition,
19 this establishes good cause for an extension of time to respond to Defendant
20 Trammell S. Crow, Jr.'s Motion to Dismiss, currently due January 27, 2023.

21 WHEREAS, I have informed Defendants attorneys of this conflict in
22 briefing schedule and suggested a new deadline of February 15, 2023, to
23 respond to Mr. Crow's Motion to Dismiss and the Defendants attorneys
24 have agreed to not oppose this reasonable extension of time.

1 WHEREAS, the parties agree that they are available to attend a
2 hearing on the Motion to Dismiss on March 24, 2023.

3 WHEREAS, to facilitate the briefing regarding the Motion to Dismiss,
4 the Plaintiffs request and the Defendants do not oppose, a modified briefing
5 schedule where Mr. Crow will file the Motion to Dismiss on January 9,
6 2023; Plaintiffs will file their response by February 15, 2023; Mr. Crow will
7 file his reply by March 10, 2023; the hearing will be on March 24, 2023, at
8 1:30 p.m. and the initial conference which was previously scheduled for the
9 same day as the Motion to Dismiss hearing, would be rescheduled for a
10 date to be decided by the Court.

11 WHEREAS, the case involved is not one for summary judgment in
12 lieu of a complaint.

13
14 Dated: January 13, 2023

15
16 By: 

17 John G. Balestriere*

18 Matthew W. Schmidt (Cal. Bar No.
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